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September 2, 2020

Via ECF Only

Honorable Kimba M. Wood
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY. 10007

MEMO ENDORSED

Re: U.S. v. Oris Sanchez Olivo
Case 19-cr-484 (KMW)

Your Honor,

On March 12, 2020, just before the COVID-19 pandemic struck New York, my office filed a request for an extension of time to make an application pursuant to Rule 35 of the Federal Rules of Criminal Procedure for the Court to reconsider and correct Ms. Sanchez Olivo's sentence. The letter was filed via ECF but under the MJ docket number instead of the CR docket number. Between the complete shutdown of my office and the Courts this issue has languished without any resolution that I am aware of. By this letter we respectfully request that the Court grant a 35 day extension of time to file the described Rule 35 application.

] granted

Without litigating the merits, the issue to be raised involves the Defendant's mother's inability to act as full time parent to my client's children if she were to be incarcerated. This situation has only been exacerbated by COVID-19, her age and increased risks involved tending to young children as schools only partial reopen. The reality of remote learning will make it impossible for my client and her husband (who is expecting a sentence of incarceration on his case) to care for their children. Your consideration of this request is respectfully appreciated.

Yours truly,

A handwritten signature in black ink, appearing to read "MDH", written over a horizontal line.

Michael D. Horn, Esq.
Counsel for the Defense
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SO ORDERED: N.Y., N.Y. 9/8/20

A handwritten signature in blue ink, appearing to read "Kimba M. Wood", written over a horizontal line.
KIMBA M. WOOD
U.S.D.J.